

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

WANDA OVALLES, INDIVIDUALLY	:	
AND P.P.A. A. OVALLES AND	:	
WILSON OVALLES,	:	
Plaintiffs	:	
	:	
v.	:	C.A. NO. 14-137M
	:	
SONY ELECTRONICS INC.;	:	
BEST BUY CO., INC.; FOXCONN	:	
INTERNATIONAL INC.; AND	:	
JOHN DOE CORPORATIONS 1-4,	:	
Defendants	:	

JOINT MOTION TO AMEND SCHEDULING ORDER

Now come the parties in the aforementioned matter and hereby respectfully request that this Honorable Court extend the deadline for close of discovery, and all corresponding deadlines, in the current scheduling order. Discovery by and between plaintiffs and defendants is ongoing and additional time is necessary for the completion of discovery. To date, twenty-eight (28) depositions have been taken; however, several additional depositions of witnesses are currently being scheduled. The parties are working diligently to move this case forward as quickly as possible and anticipate that all of the outstanding discovery, including depositions, can be completed by April 8, 2016.

For the reasons set forth above, the parties request that the Court allow this motion and adjust the scheduling order to reflect the following dates:

Factual discovery shall be completed by April 8, 2016.

Plaintiffs shall provide expert disclosures by May 20, 2016.

Defendants shall provide expert disclosures by July 19, 2016.

Expert discovery shall be completed by August 26, 2016.

Dispositive motions shall be due by September 9, 2016.

Pretrial memorandum shall be due by October 14, 2016.

WHEREFORE, the parties respectfully request that their Motion to Extend the Discovery Deadlines be granted.

Defendant,
Sony Electronics, Inc.
By their attorneys,

/s/ John F. Kelleher, Esq.

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CERTIFICATION

I hereby certify that on this 4th day of January, 2016, a true copy of the within document was electronically mailed to:

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